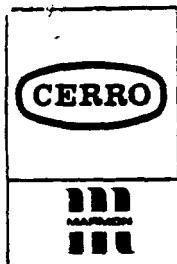


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CERRO COPPER PRODUCTS CO.

A member of The Marmon Group of companies

P.O. Box 681
East St. Louis, Illinois 62202
618/337-6000

153799

September 3, 1986

Mr. Richard Kissel, Esq.
Attorney at Law
Martin, Craig, Chester & Sonnenschein
115 South LaSalle St., Suite 2400
Chicago, IL 60603

Dear Dick:

The following wording is suggested for the letter to Ann Weinert at Region V EPA which she requested during our conference call on September 2:

The comprehensive wastewater characterization study at the Cerro facility was conducted in April of this year by Patterson & Associates. As Dr. Patterson explained, this study included a seven day round the clock sampling program at 21 different points in the Cerro waste stream. In August, the final reports from the laboratories were received and these have yielded some 130,000 data points which Patterson & Associates is currently evaluating to provide much of the data requested in Attachment I to the July 29th letter from J. David Ranken.

The complexity of this study (identified as "Phase II") can be appreciated when consideration is given to the fact that the Cerro facility at Sauget is the only fully integrated copper plant in this country. It is more than 60 years old and its pattern of growth, expansion and modernization has resulted in a physical arrangement having many of the operations overlapping and inter-connected rather than a straight line arrangement. This has resulted in a wastewater flow configuration that is extremely complex. The operations are subject to three different National Categorical Pretreatment Standards.

Most of the information requested in paragraph (1), Nature of Operation, in Attachment I, has been prepared and can be

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submitted by the end of this month. This would not include any flow data which would need to be derived from the Phase II study, and Dr. Patterson indicated that there should be sufficient information available by October 15 to provide the flow data.

Items (2) - Wastewater Flows and (3) Nature and Concentration of Pollutants require completion of the Phase II study to provide the information requested therein. At the present time we believe that this will be available around the end of December of this year. Dr. Patterson has indicated that it would be possible to provide the information on wastewater flows several weeks in advance of the completion of the Phase II study. However, this would entail a considerable amount of extra work on his part and we would much prefer to submit both at the same time. (Ann Weinert said this would have to be checked out with others at EPA.)

Compliance Certification, Item (4), would be provided along with Items (2) and (3) at the completion of the Phase II study.

Item (5), Compliance Schedule, is very difficult to determine at this time because it is totally contingent on the data that would be provided by the Phase II study. Under most optimistic circumstances it might be available 30 days after the completion of Phase II. On the other hand, if those results necessitate further engineering studies it would be a matter of several additional months before a reasonable compliance schedule could be derived.

A copy of this letter is being sent to Jim Patterson and I assume he will let us know if there are any errors or omissions. Early next week I will send you copies of the schematics, charts, etc. which I propose submitting by the end of this month.

Very truly yours,

CERRO COPPER PRODUCTS CO.

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S. A. Silverstein

Manager of Energy and Environmental Affairs

SAS/ge

cc: P. Tandler
J. Patterson

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